

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

FIESTA MART, L.L.C., )  
v. )  
ACON INVESTMENTS, LLC, )  
Plaintiff, ) CIVIL ACTION NO. 4:18-cv-04704  
Defendant. ) Judge Ewing Werlein, Jr.  
v. )  
 )

**JOINT SUBMISSION OF  
VERIFIED PROOF OF CITIZENSHIP**

Pursuant to this Court's March 18, 2019 Order (Dkt. No. 15), the Parties hereby submit their Verified Proof of Citizenship listing the identity and citizenship of each Party's members through each layer of the association. Plaintiff Fiesta Mart, L.L.C.'s Verified Proof of Citizenship is attached hereto as Ex. 1, and Defendant ACON Investments, L.L.C.'s Verified Proof of Citizenship is attached hereto as Ex. 2.

Dated: March 26, 2019

Respectfully Submitted and Approved,

*s/ Paul Green*

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*Counsel for Plaintiff Fiesta Mart, L.L.C.*

*Counsel for Defendant ACON  
Investments, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Joint Submission of Verified Proof of Citizenship was served on the following counsel of record by electronically filing it with the Clerk of the Court using the CM/ECF system on March 26, 2019.

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*s/ Tiffanie N. Limbrick*  
Tiffanie N. Limbrick

# EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**PLAINTIFF'S VERIFIED  
PROOF OF CITIZENSHIP**

Pursuant to this Court's March 18, 2019 Order (Dkt. 15), Plaintiff Fiesta Mart L.L.C. submits this Verified Proof of Citizenship identifying the citizenship of all of Plaintiff's members through each layer of the association.

1. Fiesta Mart, L.L.C. is a Texas limited liability company.
  2. Fiesta Mart, L.L.C.’s sole member is Fiesta Mart Holdings, L.L.C., a Delaware limited liability company.
  3. Fiesta Mart Holdings, L.L.C.’s sole member is Fiesta Mart Investments, L.L.C. (“FMI”), a Delaware limited liability company.
  4. FMI has three members.
  5. FMI’s first member is Bodega Latina Corporation (“Bodega”), a Delaware corporation with its principal place of business in California.
  6. FMI’s second member is Fiesta Investors, L.L.C., a Delaware limited liability company. In turn, Fiesta Investors, L.L.C.’s sole member is Bodega.
  7. FMI’s third and final member is Fiesta Investors Holdings, L.L.C., a Delaware limited liability company. In turn, Fiesta Investors Holdings, L.L.C.’s sole member is Bodega.

Dated: March 26, 2019

Respectfully submitted,

**SIDLEY AUSTIN LLP**

/s/ Penny P. Reid \_\_\_\_\_

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**COUNSEL FOR PLAINTIFF  
FIESTA MART, L.L.C.**

**VERIFICATION OF PLAINTIFF'S PROOF OF CITIZENSHIP**

I, Josemaria Angulo, verify and declare under penalty of perjury that the facts stated in the foregoing Plaintiff's Verified Proof of Citizenship are true and correct.

Executed on March 21, 2019.

  
\_\_\_\_\_  
Josemaria Angulo

# EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
Houston Division**

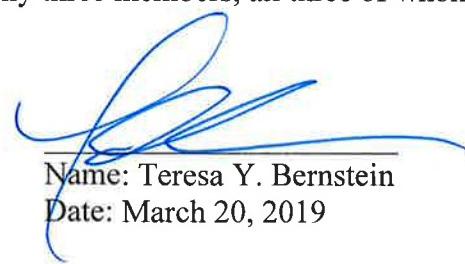
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FIESTA MART, LLC, )  
Plaintiff, )  
v. ) Civil Action No. 4:18-cv-04704  
ACON INVESTMENTS, L.L.C., )  
Defendant. )  
\_\_\_\_\_  
)

**VERIFICATION AS TO ACON INVESTMENTS, L.L.C.**

I, Teresa Y. Bernstein, Chief Operating Officer, General Counsel, and Chief Compliance Officer of ACON Investments, L.L.C., do solemnly declare and affirm under penalty of law that to the best of my knowledge, information, and belief:

1. ACON Investments, L.L.C. has only three members, all three of whom are natural persons domiciled in Maryland.



Name: Teresa Y. Bernstein  
Date: March 20, 2019